

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:) Chapter 11
SEARS HOLDINGS CORPORATION., et al.,¹) Case No. 18-23538 (RDD)
Debtors.) (Jointly Administration Requested)
)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to section 1109(b) of the Bankruptcy Code and Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned attorney appears as counsel for Yang Ming (America) Corp. and Yang Ming Marine Transport Corp. (collectively "Yang Ming"), parties-in-interest in the above-captioned cases, and requests that all notices given or required to be given in the above captioned cases be given and served upon the party identified at the following address and further requests to be added to the Master Service List:

Gary F. Seitz

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovol Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code section and Bankruptcy Rules specified above, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtors.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver of any of the rights of Yang Ming including: (i) the right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) Yang Ming's right to enforce any contractual provision with respect to arbitration, or (v) any other rights, claims, actions, or defenses to which Yang Ming is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions and defenses expressly are reserved.

Dated: October 15, 2018

Philadelphia, PA

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Gary F. Seitz
Gary F. Seitz

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Counsel to Yang Ming (America) Corp. and Yang Ming
Marine Transport Corp. (collectively "Yang Ming")

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October 2018, a true and correct copy of the foregoing was sent by ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Gary F. Seitz
Gary F. Seitz